

GUIDELINE C-12

Training Requirements for Drivers of Waste Transportation Vehicles

Responsible Director:

Environmental Approvals Access and Service Integration Branch

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1.0 INTRODUCTION

Regulation 347 under the *Environmental Protection Act* has been designed to ensure that wastes are effectively managed from the point of their generation to where they are ultimately processed or disposed of. To provide this necessary control, the regulation includes definitions for different waste types and detailed requirements for a range of waste management activities. This guideline deals with one of the major responsibilities for the transportation of municipal waste, liquid industrial waste or hazardous waste: driver training.

Regulation 347 (see paragraph 9 of subsection 16 (1)) requires that drivers of vehicles used for the transportation of municipal waste, liquid industrial waste or hazardous waste be trained in the following five areas:

- i) the operation of the vehicle and waste management equipment,
- ii) relevant waste management legislation, regulations and guidelines,
- iii) major environmental concerns for the waste to be handled,
- iv) occupational health and safety concerns for the waste to be handled, and
- v) emergency management procedures.

The responsibility for providing driver training rests with operators of companies involved in the transportation of municipal waste, liquid industrial waste or hazardous waste. This guideline and procedure have been prepared to assist these operators (carriers) in the design and assessment of training programs given to their drivers. It can also be used as a syllabus either by carriers or by specialized training organizations involved in the design and offering of effective training programs.

In the case of carriers of hazardous wastes, the training program described in this guideline can be integrated with the requirement for training specified under the federal *Transportation of Dangerous Goods Act* (TDGA) or the provincial *Dangerous Goods Transportation Act*. Although training under TDGA is, for the most part, sufficient to ensure compliance with Regulation 347, training is required in the following additional areas to ensure full compliance:

- relevant waste management legislation, policies and guidelines,
- major environmental concerns for the wastes to be handled.

For municipal wastes, liquid industrial wastes and for those hazardous wastes not covered by the TDGA such as Leachate Toxic Waste and Severely Toxic

Waste, training programs should follow this guideline.

Because of the varied nature of the waste management industry, programs will have to be tailored to meet the needs of individual companies. In some cases, it may be necessary for carriers to train beyond the areas identified by the guideline where there exists an important environmental or occupational health concern.

1.1 Application of this Guideline

This guideline is intended for use by operators of waste management systems in designing their driver training programs or in evaluating driver training programs offered by outside training organizations.

The guideline shall be used by staff of the Ministry of the Environment's Operations Division to:

- communicate the required components of a driver training program to operators of waste management systems;
- evaluate applications for new or revised waste management system Environmental Compliance Approvals; and
- evaluate compliance with driver training requirements.

2.0 ENVIRONMENTAL APPROVALS AND ADMINISTRATIVE MATTERS

In general, operators of companies transporting waste require an Environmental Compliance Approval or a registration in the Environmental Activity and Sector Registry.

Environmental Compliance Approval (ECA)

Section 27 of the *Environmental Protection Act* (EPA) requires that an ECA be obtained for waste management activities. This requirement applies to all transportation of waste that is not otherwise exempt from Part V of the EPA or otherwise prescribed for registration in the Environmental Activity and Sector Registry (EASR, see below for more detail on what is prescribed). Obtaining an ECA requires that an application be submitted to the Ministry of the Environment (the ministry) that provides information about the waste management activities including the types of waste that will be transported.

Upon review of the application, the ministry may issue the approval which will include conditions with which the holder of the approval must comply.

Environmental Activity and Sector Registry (EASR)

Certain eligible waste management systems are prescribed for EASR in O. Reg. 351/12 (Registrations under Part II.2 of the Act - Waste Management Systems). These include waste management systems that only transport non-hazardous waste and do not include waste processing or storage as part of the waste management activities, among other eligibility criteria set out in O. Reg. 351/12. Waste management systems that are eligible for EASR do not require an Environmental Compliance Approval but instead must be registered in EASR which is a web-based electronic registry system operated by the ministry. For more information on this EASR registration process and the activities that are prescribed, please refer to the ministry Publication “Non-Hazardous Waste Transportation Systems: Fact Sheet - Environmental Registration” (PIBS# 9138e).

No matter which type of authorization is required (ECA / EASR), if the system involves the road transportation of municipal waste, liquid industrial waste or hazardous waste, it is subject to the driver training requirements set out in Regulation 347.

2.1 ECA: Application Information and Typical Conditions of Approval

When applying for either a new or a revised waste management system ECA for the transportation of municipal waste, liquid industrial waste or hazardous waste, the operator must provide written confirmation that he/she has an acceptable driver training program in place which addresses the five items in paragraph 9 of subsection 16 (1) of Regulation 347.

At the same time, the operator may be required to also provide the ministry with a list confirming the names of trained drivers employed by the business at the time of application.

If the approval is issued after reviewing the application, conditions respecting driver training are typically incorporated in the ECA Examples of the type of conditions that may be included relating to driver training are provided in the table below:

Table 1. Examples of typical conditions of approval in ECAs related to driver training

Example No.	Example Condition
i.	Every driver must carry a copy of his/her Certificate of Training at all times when operating or in any way tending a waste transportation vehicle.
ii.	An individual who has not successfully completed a driver training program is prohibited from operating or in any way tending a waste transportation vehicle except as part of an approved training program, in the course of which he/she must be under the direct supervision of a trained driver at all times.
iii.	A waste management system operator must maintain, at the operator's place of business, a list of the trained drivers in his/her employ, and must make this list available for ministry inspection upon request.

2.2 EASR: Registry Requirements for Driver Training

All EASR-registered waste management systems must have a driver training program as per paragraph 9 of subsection 16(1) of Regulation 347. In addition to this, O. Reg. 351/12 has requirements related to how the training program must be documented for EASR-registered systems.

To demonstrate proof of training, all drivers of waste transportation vehicles must keep a copy of a certificate or other proof indicating that the driver of the waste transportation vehicle has received the training. This requirement is from paragraph 4 of subsection 4(1) of O. Reg. 351/12.

The person registering a system in EASR is also required to retain a copy of the training materials used to train drivers. This requirement is from subsection 5(2) of O. reg. 351/12. The training materials do not need to be retained in each truck but are required to be retained in a manner such that they may be made available to the ministry upon request (for instance filed at the business' office). The training materials include any written material or presentations given to employees to fulfill the training requirement whether

prepared by the company itself or provided by a third party. The most up-to-date training material should be retained and provided to the ministry if requested.

2.3 Certificate of Training Format

As described in the sections above, waste management systems that have an ECA or have registered in EASR will typically have a requirement for a certificate to be held in the waste transportation vehicle indicating that the driver has received training. This certificate should include at a minimum the following information:

- the name of the driver;
- the date that the driver received the training; and
- the name of the organization or business that provided the training.

This certificate can either be issued by the company itself or by a third party organization that provided the training. For companies conducting their own training, Appendix 1 of this guideline has a template that can be used to generate a Certificate of Training.

3.0 REQUIRED TRAINING CONTENT

This section provides additional detail on the information that should be covered by a training program in order to meet the requirement of paragraph 9 of subsection 16 (1) of Regulation 347. A driver should be able to demonstrate familiarity with the training content below upon completion of the drivers training program.

Table 2. The Operation of the Vehicle and Waste Management Equipment

Task No.	Task
a.	The operation of all waste management vehicles that the driver is likely to operate and/or all prevailing models commonly in use by the carrier.
b.	The location, function and operation of all controls for waste management equipment (pumps, valves, gauges, etc.) and any of their emergency features.

Task No.	Task
c.	The proper loading and unloading procedures for the common types of wastes handled by the carrier. This should cover procedures for all methods of waste transport (e.g. drums, totes, canisters, bulk shipments etc).
d.	The following manufacturer's specifications for the vehicle: <ul style="list-style-type: none"> – maximum capacity – load distribution constraints – dimensions – material of construction

Table 3. Relevant Legislation

Task No.	Task
a.	A general understanding of the following provisions in the <i>Environmental Protection Act</i> . <ul style="list-style-type: none"> – the requirements related to the need for approvals under S. 27, S. 40, and S.41; – applicable operational requirements from O. Reg. 351/12 for EASR-eligible waste management systems, if applicable; and – penalties for improper management.

Task No.	Task
b.	<p>An understanding of the following Regulation 347 requirements important to drivers:</p> <p><u>All waste transportation</u></p> <ul style="list-style-type: none"> – requirement for vehicles to be leak-proof and covered where necessary to prevent odours, the falling or blowing of waste materials or other emissions from the vehicle – internal vehicle documentation requirements (ECA or Confirmation of Registration in EASR, certificate of insurance, certificate of driver training) – external truck identifier requirements (ECA or EASR #'s visible on trucks) <p><u>Liquid industrial waste and hazardous waste transportation</u></p> <ul style="list-style-type: none"> – requirements for the manifest to be complete with no obvious errors at the time of a waste transfer – registration requirements for waste generators – all safety mark/placarding requirements under TDGA, as applicable – locking requirements for valves when the driver is not in attendance – responsibility of driver to be in attendance during loading or unloading, unless an operator from the generator's or receiver's site is present

Task No.	Task
c.	<p>An awareness of other applicable legislation, regulations and guidelines for the wastes handled by the carrier, as applicable</p> <p><u>Polychlorinated Biphenyl (PCB) Waste</u></p> <ul style="list-style-type: none"> – Regulation 362 (Waste Management - PCBs) <p><u>Asbestos Waste</u></p> <ul style="list-style-type: none"> – Guideline C-6: Handling, Transportation And Disposal Of Asbestos Waste In Bulk <p><u>Biomedical Waste</u></p> <ul style="list-style-type: none"> – Guideline C-4: The Management Of Biomedical Waste In Ontario <p><u>Spills</u></p> <ul style="list-style-type: none"> – Part X of the <i>Environmental Protection Act</i> (Spills) <p><u>Dangerous Goods</u></p> <ul style="list-style-type: none"> – <i>Dangerous Goods Transportation Act</i> (Ontario) – <i>Transportation of Dangerous Goods Act</i> (Canada) (and regulations thereunder) – <i>Occupational Health and Safety Act</i>

Table 4. Major Environmental Concerns

Task No.	Task
a.	<p>For transportation of hazardous waste, a knowledge of the characteristics of waste dangerous goods as defined under the <i>Transportation of Dangerous Goods Act</i> (Canada) (corrosive, flammable, infectious, etc.)</p>

Task No.	Task
b.	For transportation of liquid industrial waste and/or hazardous waste, a knowledge of the characteristics of liquid industrial waste, hazardous industrial waste, acute hazardous waste chemical, hazardous waste chemical, leachate toxic waste and severely toxic waste as defined under Regulation 347. Also, a knowledge of the waste characterization of biomedical waste as defined in Guideline C-4
c.	A knowledge of the physical properties of wastes to be handled by the driver which affect its potential risks and disposal options (liquid, solid, slurry, or gas.)
d.	A knowledge of the potential effects on the environment of wastes to be handled by the driver if allowed to discharge to the environment
e.	A knowledge of compatibilities of wastes to be handled by the driver
f.	Drivers should be instructed to only collect waste where information about all the types and characteristics of the waste is supplied in advance of collection or supplied at the time of collection by the person generating/transferring the waste to the waste management system

Table 5. Occupational Health and Safety Concerns

Task No.	Task
a.	Responsibilities of all parties as prescribed under the <i>Occupational Health and Safety Act</i> .
b.	Biomechanical considerations for loading and unloading waste

Task No.	Task
c.	Relationship between a waste's characteristic (corrosivity, toxicity, etc.) and the nature and degree of injury that could result from inhalation, ingestion and skin contact as well as any emergency action required.
d.	Protective measures and equipment to be used to prevent inhalation, ingestion and skin contact with wastes of different characteristics.
e.	The function, location, and use of safety equipment carried in the unit, including fire extinguishers, protective clothing and respiratory equipment as applicable

The information for specific wastes required under subsections (c) and (d) above can be supplied to drivers at the time of each waste transfer.

Table 6. Emergency Management Procedures

Task No.	Task
a.	Procedures for handling wastes during emergencies and location of any emergency features on operating equipment.
b.	Initial response required from the driver in the event of an accident involving various types of wastes.
c.	Emergency call requirements in the event of a spill under Section 92 of the <i>Environmental Protection Act</i> and O. Reg. 675/98 (Classification and Exemption of Spills and Reporting of Discharges).
d.	Need to comply with the entire notification requirements in the Transportation of Dangerous Goods Regulation if applicable.

Task No.	Task
e.	In particular, drivers should be aware of the location and function of vehicle emergency equipment (fire extinguishers, red flags, flares, electric lanterns, fuses, first aid kit, rubber gloves, goggles, rubber boots, self-contained breathing apparatus, etc).

APPENDIX 1: EXAMPLE FORMAT FOR DRIVER TRAINING CERTIFICATES

Certificate of Driver Training for Waste Management Systems

This certifies that _____ [Driver Name]
has been trained in accordance with paragraph 9 of subsection 16 (1) of
Regulation 347 (General – Waste Management) under the *Environmental
Protection Act*

Waste Management System Info

Business Name _____

ECA/EASR # _____

Training Info

Date Training Completed (_____ / _____ / _____) [dd/mm/yyyy]

Trained by _____ [bus./org. name]

Note that this format for a certificate is presented as an example only. In some cases training organizations may provide their own certificate with a different format.